

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

CASE NUMBER:

MAGISTRATE JUDGE
GERALDINE SOAT BROWN

JON DAVIS

FILED
MAY 28 2008
5-28-08
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

08CR

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I, JOSEPH RASCHKE, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about May 27, 2008 in Cook County, in the Northern District of Illinois defendant(s) did, (Track Statutory Language of Offense)

by force and violence, and intimidation, take from the person and presence of a bank employee at National City Bank, 2300 North Western Avenue, Chicago, Illinois, approximately \$4,670 in United States Currency belonging to and in the care, custody, control, management, and possession of National City Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation,

in violation of Title 18 United States Code, Section(s) 2113(a)

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based
Official Title

on the following facts:

See attached affidavit.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No




Signature of Complainant

Sworn to before me and subscribed in my presence,

May 28, 2008
Date

at Chicago, Illinois
City and State

Geraldine Soat Brown, U.S. Magistrate Judge
Name and Title of Judicial Officer


Signature of Judicial Officer

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

I, Joseph Raschke, being duly sworn depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been so employed for the past ten and a half years. My duties include the investigation of various crimes, such as bank robberies, kidnappings, and other violent crimes.

2. The information contained in this affidavit is based upon my personal knowledge, my participation in this investigation, information gathered from other law enforcement officers, bank employees, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause in support of the complaint against JON DAVIS, and does not contain all details or all facts of which I am aware relating to this investigation.

3. On May 27, 2008, at approximately 10:15 a.m., National City Bank, which is insured by the Federal Deposit Insurance Corporation and located at 2300 North Western Avenue, Chicago, Illinois, was robbed by a lone white male, later identified through the investigation described below as JON DAVIS.

4. Following the robbery, the victim teller was interviewed by FBI agents responding to the scene. According to the victim teller of National City Bank, the robber entered National City Bank, approached the victim teller, and gave the teller a demand note stating, "Do not let anyone notice what is happening. I don't want to use my gun. But I will. Call me Mr. Thompson. Give me all of the \$100s, \$50s, and \$20s from your drawer. Count to 20 after I leave, because if the police come I will get your first." The teller complied with the robber's demands and handed the robber

approximately \$4,670.00 in United States Currency. The robber took the money and departed the National City Bank.

5. FBI agents also interviewed the bank security guard following the robbery. According to the bank security guard, as the robber ran from the bank, the bank security guard chased him through the bank's parking lot and yelled at the robber to stop. The robber continued to run and got into a white Honda Accord with Illinois license plate 3858093 and drove away from the scene.

6. FBI agents also interviewed several witnesses in the area of the bank at the time of the robbery. According to these witnesses, they observed the guard chasing the robber, as well as the make, model, and license plate of the vehicle described above. This information was provided to Chicago Police Department (CPD) officers responding to the scene and broadcasted over the CPD radio to surrounding and responding officers.

7. Approximately ten minutes after the robbery, CPD officers observed the white Honda Accord driving west on North Avenue, approximately one mile from the National City Bank. According to one CPD officer, after a brief pursuit, the driver of the Accord lost control of the vehicle and crashed. The driver then ran from the vehicle and was apprehended by CPD officers. The driver was then identified as Jon Davis. A search of DAVIS subsequent to his arrest resulted in the discovery of approximately \$4,550.00 in United States Currency in his pants pocket. It was also determined that the white Honda Accord driven by Davis was registered to Davis' parents.

8. After being detained, DAVIS was placed in a CPD police officer's vehicle and transported back to the National City Bank, where he was identified by the victim teller and several witnesses as the man that had robbed the National City Bank and who had been chased from the

bank by the security guard, approximately fifteen minutes earlier.

9. At that time, CPD officers transported DAVIS to CPD's 14th District. After FBI Agents responded to CPD's May 28, 2008 14th District, DAVIS was taken into federal custody and transported to the Chicago FBI Office, located at 2111 West Roosevelt Road, Chicago, Illinois.

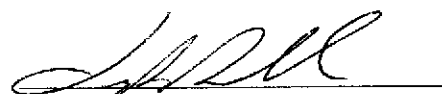
DAVIS' Post-Arrest Confession

10. FBI agents advised DAVIS of his *Miranda* rights orally and in writing. After being *Mirandized*, DAVIS agreed to and did waive his rights, orally and in writing, after which DAVIS submitted to an interview.

11. After waiving his rights orally and in writing, DAVIS informed the FBI that he had robbed the National City Bank on May 27, 2008. DAVIS provided specific details of the bank robbery.

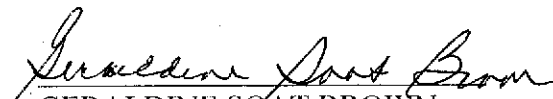
12. Based on the above information, there is probable cause to believe that JON DAVIS robbed the National City Bank at 2300 North Western Avenue, Chicago, Illinois on May 27, 2008, in violation of Title 18, United States Code, Section 2113(a).

FURTHER AFFIANT SAYETH NOT



JOSEPH RASCHKE
Special Agent
Federal Bureau of Investigation

Subscribed to and sworn before
me this 28th day of May, 2008



GERALDINE SOAT BROWN
United States Magistrate Judge